

# ***i*NETWORKS**

## **Group**

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February 14, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street  
Suite TW-A325  
Washington, DC 20554

**Received & Inspected**

**FEB 25 2013**

**FCC Mail Room**

**RE: EB Docket No. 06-36  
Annual 47 C.F.R. § 64.2009(e) CPN\ Certification for 2012  
iNetworks Group, Inc Form 499 Filer ID 823740**

Dear MS. Dortch:

Herewith transmitted, on behalf of iNetworks Group, Inc., is its 2012 CPNI Certification and Accompanying Statement for filing in the above-referenced docket. A copy had also been filed using the ECFS web site.

In the event there are any questions in the connection with this filing, please communicate with the undersigned.

Very truly yours,



Raymond L. Cowley  
Senior Vice President and General Manager  
iNetworks Group, Inc

11/11/13 Cowley rec'd  
Ltr ABCDE

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

FEB 25 2013

FCC Mail Room

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2012

1. Date filed 2/14/2013
2. Name of company(s) covered by this certification: iNetworks Group, Inc
3. Form 499 Filer ID: 823740
4. Name of signatory: Raymond L. Cowley
5. Title of signatory: Senior Vice President & General Manager
6. Certification:

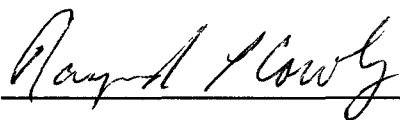
I, Raymond L. Cowley, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in the section 64.2001 *et seq.* of the Commission's rules.

The company has not taken action (i.e. proceedings instituted or petitions filed by a company at either state commission the court system or at the Commission) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represent and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentation to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 

**Attachments:** Accompanying Statement explaining CPNI procedures

## **Statement Accompanying CPNI Certification**

iNetworks Group, Inc (“iNetworks”) hereby explains how it’s procedures comply with the requirements set forth in Section 64.2001 *at seq.* of the FCC’s Rules.

iNetworks provides two types of services to its customers. First, iNetworks is a Virtual Network Provider providing resold private line services to its customer, having purchased those circuits from telecommunications carriers, such as Verizon, on a wholesale basis. iNetworks had no information about the data transmitted on the circuits it supplies. Accordingly, in connection with this service iNetworks does not collect and thus does not possess any of the information defined as Customer Proprietary Network Information (“CPNI”) in Section 222(f) of the Communication Act beyond the points connected by the data circuits iNetworks resells.

Second, iNetworks offers a different type of service, which does involve some exposure to CPNI, and has taken the appropriate measures to protect that CPNI from unlawful disclosure. iNetworks provider PRI services, analog business lines and VoIP service to several business customers in divers geographical areas.

iNetworks receives invoices from its suppliers. Those invoices sometimes contain individually attributable call detail and other information constituting CPNI, which iNetworks passes along to its Customers.

iNetworks has instituted polices designed to protect the confidentiality of that CPNI. All members of the iNetworks staff who may be exposed to the CPNI in the invoices have been instructed that CPNI is confidential and is not to be shared with anyone outside iNetworks, except the Customer in the normal course of business. On an annual basis, all appropriate employees are provided documentation and training relative to protecting CPNI information.

iNetworks employees have been warned that inappropriate disclosure of CPNI can subject iNetworks to legal penalties that may include substantial monetary fines. Employees involved in any misuse or inappropriate disclosure of this information would be subject to disciplinary action including termination from employment. Supervisors or employees aware of any such misuse or inappropriate disclosure of CPNI must report that knowledge to iNetworks Senior Vice President and General Manager.

The CPNI referred to above is not used for any type marketing. It is not to be disclosed by telephone to anyone, because iNetworks does not have a "carrier-customer" relationship with any of the persons to whom the CPNI belongs. Thus, iNetworks has no need of a password protection or other policy for verifying customer inquiries. Similarly, iNetworks does not include provisions for regulating access to CPNI in person at retail outlets because iNetworks has no retail outlets within the meaning of the CPNI rules.

iNetworks also maintains other information necessary to bill its own customers on a monthly, flat rate basis. Such billing information is maintained in password-protected shared drive computer programs. Only employees with a need to do so are granted access to billing information. Finally, iNetworks instructs all its employees on the need to maintain the confidentiality of all corporate information, including billing information.

## **Section 64.2009 of the Commission's Rules Annual CPNI Compliance Certification**

### **Need to file if:**

Section 64.2009(e) of the Commission's rules applies to telecommunications carriers (47 U.S.C. § 153) and to interconnected VoIP providers (47 C.F.R. § 9.3). Companies that fall under the definition and must file an annual CPNI certification include, **but are not limited to:** LECs (including ILECs, rural LECs and CLECs), IXCs, paging providers, CMRS providers, resellers, prepaid telecommunications providers, and calling card providers, interconnected VoIP providers and wholesalers. **THIS LIST IS NOT EXHAUSTIVE.**

### **How to file:**

Companies must file annually between January 1 and March 1 for data pertaining to the previous calendar year. All filings are to reference **EB Docket No. 06-36**. The Commission's rules do not require a certain form or format to be used by the companies. For convenience and to assist companies in meeting the requirements of the rule the Bureau provided a suggested template that can be used. This template can be found as an attachment to the January 7, 2009, Public Notice issued by the Bureau on this topic. The Public Notice, which can be found at the below link, also contains filing procedures to be followed. [http://fjallfoss.fcc.gov/edocs\\_public/attachmatch/DA-09-9A1.pdf](http://fjallfoss.fcc.gov/edocs_public/attachmatch/DA-09-9A1.pdf).

### **Additional Information:**

Enforcement Bureau, Telecommunications Consumers Division (202) 418-7320

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